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HONORABLE FREDERICK P. CORBIT

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re

1 MIN, LLC; HOTEL AT SOUTHPORT,
LLC; and TWELFTH FLOOR, LLC,

Debtors.

Chapter 11

Lead Case No. 24-01519

(Jointly Administered)

Adv. Proc. No. 25-80007

LAN CAI, SHUIE CHEN, TIANRAN
CHEN, WEIJUN CHEN, JIE CHU,
ZHAOJUN CONG, HE CUI, JIANYING
DING, JICHUN DU, QING DU, JIEYING
FENG, YUPENG GAO, YIRAN HAN,
JINYANG HU, NAIXIN HU, XIAO HUANG,
JUNMEI JIN, XIN MENG, WEIHONG LU,
YUANYUAN MA, MIN PAN, LEI PEI, HAO
QI, XIAO RONG, JUAN SHAO, HUI
WANG, JINGYI WANG, YUQUAN WANG,
ZIDONG WANG, RONGRONG WU,
ZHAOHUI XU, QI XU, JIE YAN, KE
YANG, QIN YANG, HONGYUN YU,

**NOTICE OF AP DEFENDANTS'
MOTION FOR PARTIAL
JUDGMENT ON THE
PLEADINGS**

NOTICE OF AP DEFENDANTS'
MOTION FOR PARTIAL JUDGMENT
ON THE PLEADINGS

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1 SHUXIAN ZENG, XIAOHONG ZHANG,
2 YING ZHAO, MINBO ZHOU, NAN ZHOU,
3 HUIQING ZHU, ZILING ZENG, LUYI
4 ZHANG, JUNDI LIANG, TAO LI, YUN CAI,
5 HONGLIANG TANG, JIE TANG,
6 WENLUNG CHEN, SHI ZHANG, JUN CHE,
7 DAHE ZHANG, SHAN WAN, XIAOHONG
8 SUN, YAN LYU A/K/A YAN LU, WENYAN
9 WANG, JIALIN TIAN, RUI TANG,
10 XINHAN LIN, SIYU LIU, JIANYING
11 MENG, PHUONG NGUYEN, YEQING PAN,
12 XUERONG QI, QIANG WANG, JUNLI
13 WEI, YUNFEI WU, HONGYING YU,
14 DONGLI ZHANG,

15 Plaintiffs,

16 v.

17 HOTEL AT SOUTHPORT, LLC, TWELFTH
18 FLOOR, LLC, 1 MIN, LLC.

19 Defendants,

20 and

21 WF CREL 2020 GRANTOR TRUST,

22 Intervenor-Defendant.
23

24 TO: MATTHEW J. LIVINGSTON, of REID & WISE LLC, counsel for
25 Plaintiffs

26 AND TO: JEREMY E. ROLLER, of ARETE LAW GROUP PLLC, counsel for
27 Plaintiffs

28 AND TO: CLERK OF THE COURT

29 AND TO: U.S. TRUSTEE'S OFFICE

30 AND TO: PARTIES IN INTEREST

31 AND TO: ALL PARTIES REQUESTING SPECIAL NOTICE

32 NOTICE OF AP DEFENDANTS'
33 MOTION FOR PARTIAL JUDGMENT
ON THE PLEADINGS

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PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of AP Defendants’ Motion for Partial Judgment on the Pleadings (the “Motion”), and all prior proceedings and papers submitted in this action, Defendants 1 Min, LLC, Hotel at Southport, LLC, Twelfth Floor, LLC, and WF CREL 2020 Grantor Trust (collectively the “AP Defendants”), the AP Defendants respectfully move this Court for an order, pursuant to Rule 12(c) of the Federal Rules of Civil Procedure (made applicable to this proceeding by Rule 7012 of the Federal Rules of Bankruptcy Procedure), (i) granting partial judgment on the pleadings in favor of the AP Defendants based on the mandatory subordination of Plaintiffs’ claims; (ii) directing the remaining proceeds from the Sale of the Hotel first to WF CREL 2020 Grantor Trust pursuant to the Debtors’ Joint Plan of Reorganization [Docket No. 9]; and (iii) granting such other and further relief as this Court may deem just and proper.

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Dated: May 30, 2025

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/s/ James L. Day

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Counsel to WF CREL 2020 GRANTOR TRUST

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